

EXHIBIT 8

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHAEL WISNEFSKI,

Plaintiff,

v.

MICKEY GROUP INC. and ALEX
RABENS,

Defendants.

Case No. 1:23-cv-04984

District Judge Ellis

Magistrate Judge Kim

**PLAINTIFF'S RESPONSE TO DEFENDANTS'
THIRD SET OF DISCOVERY REQUESTS**

NOW COMES Plaintiff, MICHAEL WISNEFSKI, by and through its attorneys, GALARNYK & ASSOCIATES, LTD., and in response to the Third Set of Discovery Requests served by Defendants, MICKEY GROUP INC. and ALEX RABENS, answers as follows:

RESPONSE

Requests for Production

1. All electronic communications (including, but not limited to text messages and personal emails) between Wisnefski and any other person or persons from April 1, 2022, to present that include one or more of the following terms:

- Mickey
- Alex
- Rabens
- severance
- fired
- fire

- termination
- terminate
- employment contract
- employment agreement
- offer letter
- commission

RESPONSE: Plaintiff objects to this request on the grounds that it is overbroad, unduly burdensome, disproportionate to the needs of the case based upon the size of this action, and irrelevant. Defendants' request does not limit the required production to documents regarding Plaintiff's employment with or termination from Mickey Group. Defendants' request would require Plaintiff to produce numerous documents that contain one or more of the requested search terms, even where those documents have no connection of any kind to this lawsuit.

Responsive documents will be produced to the extent that they contain one of the search terms requested above and one of the following additional terms: (1) Mickey; (2) Alex; or (3) Rabens. All other documents will be withheld from production on the basis of the objections stated above.

Respectfully Submitted,
Plaintiff, Michael Wisneski

By: /s/ Andrew J. Cunniff, Esq.
One of His Attorneys

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